

1 BARRY SULLIVAN (SBN 136571)
2 JOSEPH HELGESON (SBN 229414)
3 STEPHENSON, ACQUISTO & COLMAN
303 NORTH GLENOAKS BOULEVARD, Suite 700
3 BURBANK, CALIFORNIA 91502-1119
4 Telephone: (818) 559-4477
4 Facsimile: (818) 550-5484

5 Attorney for Plaintiff,
DOCTORS MEDICAL CENTER OF MODESTO, INC.,
6 a California corporation

7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 DOCTORS MEDICAL CENTER OF CASE NO: 1:05-cv-00028-REC-SMS
11 MODESTO, INC., a California
corporation,
12 Plaintiff,
13 v.
14

STIPULATION OF DISMISSAL OF
DEFENDANT ALLIANCE
INTERNATIONAL ASSISTANCE

14 ALLIANCE INTERNATIONAL
15 ASSISTANCE, a Texas corporation, and
TRAVEL AND PERSONAL
16 UNDERWRITERS LIMITED, a British
corporation,

17 Defendants.

18 _____ /
19

20 IT IS HEREBY STIPULATED by and between the parties to this action through
21 their designated counsel that the defendant "Alliance International Assistance" be
22 dismissed with prejudice pursuant to the terms of the April 7, 2005 stipulation and
23 subsequent order and Fed. R. Civ. Proc. Rule 41(a)(ii).

24 ///
25 ///
26 ///
27 ///
28 ///

1 SO STIPULATED,

2 STEPHENSON, ACQUISTO & COLMAN

3

4 Dated: June 9th, 2005

By: /s/ Joseph Helgeson
Joseph Helgeson, Esq.
Attorney for Plaintiff,
DOCTORS MEDICAL CENTER OF
MODESTO

5

6 SO STIPULATED,

7

8 LONG & LEVIT LLP

9

10

11 Dated: June 9th, 2005

12 By: /s/ Seth Watkins
Seth Watkins, Esq.
Counsel for Defendants

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

[PROPOSED] ORDER

2 The parties, having stipulated to dismiss the defendant Alliance International Assistance
3 with prejudice pursuant to the terms of the April 7, 2005 stipulation and subsequent order,

5 IT IS HEREBY ORDERED that defendant Alliance International Assistance is
6 dismissed with prejudice from this action, pursuant to Fed. R. Civ. Proc. Rule 41(a)(ii).

9 Date: 6/20/05 ROBERT E. COYLE
Signature